

C08-1001 JCC JPD

WASHINGTON STATE DEPARTMENT OF CORRECTIONS

D.O.C # 987686

CASE # 04-1-12049-3 King Co.

MOTION FOR VIOLATIONS

OF THE 14TH AMENDMENT

HOUSE BILL 6157 PILOT PRO-

GRAM

W.A.C 137-

PETITION FOR WRIT OF

MANDAMUS ACTIONS

AGAINST STATE OFFICERS

DEPARTMENT OF D.O.C

DEPARTMENT OF CORRECTIONS

OLYMPIC CORRECTIONS CENTER

DEFENDANT,

VS.

JOEL LAUREL ROBINSON,

PLAINTIFF, INMATE,

TO: MR. ELDOR VAIL OF THE DEPARTMENT OF CORRECTIONS

17345 LINDBERG WAS S.W.M.S 41101 TUMWATER, WA 98501

### FIRST ISSUE:

DOES THE HOUSE BILL "6157" VIOLATE THE UNITED STATE  
CONSTITUTION OF THE 14TH AMENDMENT?

### SECOND ISSUE:

IS IT RIGHT FOR STAFF/CONSULT AT OLYMPIC CORRECTIONS  
CENTER TO REFUSE TO HELP A INMATE TO BE RELEASED ON  
HIS E.R.D.?

### ARGUMENT

IN TRYING TO HELP ALL INMATES IN NEED THE STATE HAS  
INTRODUCED THROU HOUSE BILL "6157" A PROGRAM IN WHICH  
D.O.C MUST HELP ALL INMATES WHO IS OF HIGH RISK,

(1)

MAIL

FILED  
LOGGED  
RECEIVED

JUN 25 2008

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY

HIGH NEEDS OR AN INDIVIDUAL WITHOUT A VIABLE RELEASE PLAN. SEE HOUSE BILL "6157" (4). UNDER THIS PROGRAM A OFFENDER MUST MEET THE FOLLOWING.

- (1) MUST BE AN ACTIVE OFFENDER OF WASHINGTON STATE DEPARTMENT OF CORRECTIONS (D.O.C.) AND HAVE A TERM OF COMMUNITY SUPERVISIONS WITH AT LEAST 12 MONTHS OF SUPERVISIONS REMAINING ON ANY SINGLE CAUSE OR COMBINATION OF CAUSES.
- (2) MUST CURRENTLY BE INCARCERATED IN A D.O.C. PRISON OR WORK RELEASE FACILITY, COUNTY JAIL, WESTERN STATE HOSPITAL (WSH) OR EASTERN STATE HOSPITALS (E.S.H) OR HAVE BEEN RELEASED WITHIN THE 15 DAYS FROM A COUNTY JAIL/PRISON FOR SERVING HIS/HER INITIAL JAIL/PRISON SENTENCE ORDERED BY THE COURT.
- (3) MUST HAVE HIS FIRST FELONY CONVICTION IN THE STATE OF WASHINGTON IN A PILOT PROJECT COUNTY AND MUST RELEASE TO PILOT PROJECT IN COUNTY OF ORIGIN.
- (4) MUST BE A D.O.C. OFFENDER WHO IS HIGH RISK, HIGH NEEDS OR AN INDIVIDUAL WITHOUT A VIABLE RELEASE PLAN.
- (5) MUST BE WILLING TO PARTICIPATE IN ALL RECOMMENDED PROGRAMS AFFILIATED WITH THE HOUSING PROGRAM AND SIGN THE PARTICIPANT AGREEMENT AND RELEASE OF INFORMATION DOCUMENTS.

(6). MUST NOT HAVE ANY SERIOUS INFRACTIONS OR LIKE BEHAVIOR IN COUNTY / W.S.H / E.S.H WITHIN THE LAST 90 DAYS.

(7). MUST BE ELIGIBLE FOR RELEASE BETWEEN 1-1-08 AND 7-1-09

(8) MUST NOT HAVE ANY ACTIVE FELONY WARRANTS OR DETAINERS

(9) MUST NOT BE A FROM OUT OF STATE (F.O.S) OFFENDER IN WASHINGTON UNDER INTERSTATE COMPACT WITH NO ACTIVE WASHINGTON STATE COMMUNITY SUPERVISION OF AT LEAST 12 MONTHS.

(10) MUST NOT BE A D.O.C OFFENDER BEING RELEASED FROM CUSTODY AFTER SERVING VIOLATIONS SANCTIONS CONFINEMENT UNLESS THE OFFENDER WAS 1) ALREADY AN ACTIVE PARTICIPANT IN THE HOUSING PROGRAM AT THE TIME OF THE VIOLATION, AND 2) IS ACCEPTED BACK INTO HOUSING OR SERVICES, OR 3) HAS BEEN PLACED ON A WAITING LIST FOR RE-ENTRY INTO THE PROGRAM.

### ARGUMENT

INMATE JOEL LAVER ROBINSON ARGU'S THAT HOUSE BILL "6157" VIOLATES THE UNITED STATES CONSTITUTION'S 14TH AMENDMENT IN (TWO) PARTS, 1). THE LAW IT SELF IS UNCONSTITUTIONAL TO REQUIRE ANY INMATE TO HAVE A PRE-APPROVED RELEASE ADDRESS BASED ON THE FACTS THAT ALL INMATES MAY NOT HAVE A VIABLE RELEASE PLAN.

2). IT IS VERY WONDERFUL FOR HOUSE BILL "6157" HAS A PART IN THE BILL CALLED THE HOUSING PILOT PROGRAM IN WHICH D.O.C PROVIDES THOSE OFFENDERS WITH OUT A VIABLE RELEASE PLAN HELP FOR ONE YEAR.

MR. ROBINSON IS A PART OF OFFENDERS WITH OUT A VIABLE RELEASE PLAN, HE DID SIGN THE PAPER WORK FOR THE HOUSING PILOT PROGRAM BACK IN MAY 16TH OF 2008, BUT WAS TOLD BY CONSOR MS. OLSON, AT OLYMPIC CORRECTIONS CENTER THAT THERE MAY NOT BE ANY FINANCING TO HELP HIM WITH HIS RELEASE, THE PLAINTIFF WAS INFORMED BY CONSOR MS. OLSON JUNE 19TH, 2008.

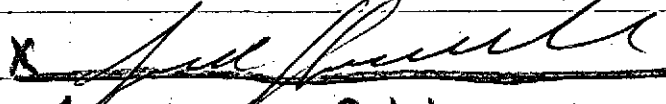
WITH MR. ROBINSON'S 10 DAY RELEASE, HIS E.P.A DATE IS AUG 15TH, 2008, IF MR. ROBINSON IS FORCED TO REMAIN IN PRISON PASS AUG. 15TH 2008, THIS IS A VIOLATION OF HIS CONSTITUTIONAL RIGHTS UNDER THE 14TH AMENDMENT SEE: UNITED STATES SUPREME COURT RULING IN, ANDERSON VS. ROMERO, 72 F.3D 518 (7TH CIR. 1995) WHICH STATES, EQUAL PROTECTION CLAUSE FORBIDS A STATE D.O.C TO TREAT ANY ONE GROUP OF OFFENDERS DIFFERENT FROM OTHERS.

THE FACT THAT MR. ROBINSON IS A OFFENDER WITH OUT A VIABLE RELEASE PLAN D.O.C MUST HELP HIM WITH A PLAN BEFOR HIS RELEASE DATE UNDER HOUSE BILL "6157" IN NOT DOING SO THIS WOULD VIOLATE HIS 14TH AMENDMENT.

CONCLUSION

IN THE FURTHERANCE OF JUSTICE INMATE/PLAINIFF, JOEL LAUEL ROBINSON D.O.C #987686 PRAYS TO "MR. ELDOR VAIL" OF THE DEPARTMENT OF CORRECTIONS AND TO THE UNITED STATES FEDERAL COURT OF SEATTLE WA. THROU PETITION FOR WRIT OF MANDAMUS UNDER U.S.C. 2241 TO ALLOW MR. ROBINSON TO BE RELEASED ON HIS E.A.D. DATE OF 08-15-08 VIA 10 DAY EARLY RELEASE,

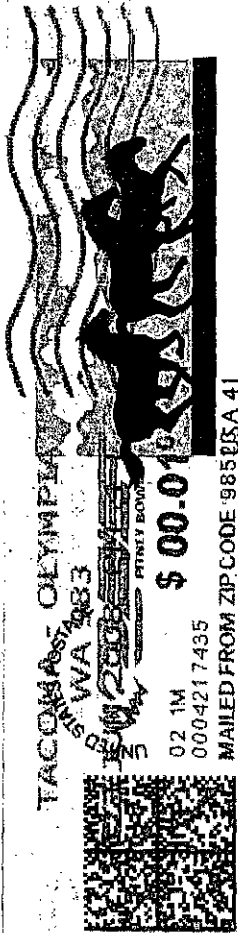
RESPECTFULLY SUBMITTED THIS DATE JUNE 23rd OF 2008

X   
JOEL LAUEL ROBINSON  
#987686  
OLYMPIC CORR. CENTER  
11235 HOK MAIN LINE  
FORKS WA. 9833-9492

A COPY OF THIS PETITION HAS BE MAIL TO ALL PARTYS.



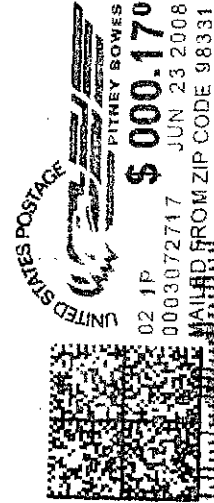
JOEL LARVEL ROBINSON #987686  
OLYMPIC CORR. CENTER  
11235 HOKK MAIN LINE  
FORKS WA. 98333-9492



ATTN: CLERK, UNITED STATES FEDERAL  
COURT HOUSE 700 STEWART ST  
SEATTLE WA. 98104

THIS WAS MAILED BY AN  
OFFENDER CONFINED AT A  
WASHINGTON STATE DEPT OF  
CORRECTIONS FACILITY. ITS  
CONTENTS MAY BE UNCENSORED.

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